

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MAR - 8 2017

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No.
)
JASMINE OUTLAW,)
)
Defendant.)

4:17CR00110 AGF/NAB**INDICTMENT****Count One**

The Grand Jury charges that:

1. Lucas Hunt Village Apartments ("Lucas Hunt") is an apartment complex of 600 units located at 5303 Lucas Hunt Road, Saint Louis County, Missouri, 63121.
2. At all times relevant to this indictment, the defendant, **JASMINE OUTLAW** was employed as an assistant property manager at Lucas Hunt and was the primary employee responsible for collecting rent and mailing statements and notices.
3. Beginning in or about December 2014, the defendant, **JASMINE OUTLAW** developed a scheme to defraud Lucas Hunt and its tenants out of money and property by means of false and fraudulent pretenses, representations and promises.
4. It was part of the scheme to defraud that beginning in or about December 2014, the defendant, **JASMINE OUTLAW** requested tenants of Lucas Hunt to submit all rent payments to her and to make all money orders payable to her. It was further part of the scheme to defraud that in some instances, the defendant, **JASMINE OUTLAW**, would write her own name on the payee line of the money orders if the tenant left the payee line blank.
5. It was further part of the scheme to defraud that the defendant, **JASMINE OUTLAW**, would deposit the money orders into her personal bank account and use the money for her own personal benefit.

6. It was further part of the scheme to defraud that in order to conceal her scheme to defraud from other Lucas Hunt employees, the defendant, **JASMINE OUTLAW**, would log into the Lucas Hunt accounting system and apply receipts from old accounts to current tenant accounts to reflect a positive cash flow.

7. It was further part of the scheme to defraud that as a result of defendant's theft, some tenants appeared to be in arrears on their rent obligations, leaving them in jeopardy of being evicted.

8. It was further part of the scheme to defraud that the defendant, **JASMINE OUTLAW** mailed, and caused to be mailed, notices of eviction to tenants and proceeded to evict tenants from Lucas Hunt while knowing she had actually stolen these tenants rent payments and that these tenants had indeed paid their rent in full and in a timely manner.

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9. On or about November 10, 2015, in Saint Louis County within the Eastern District of Missouri,

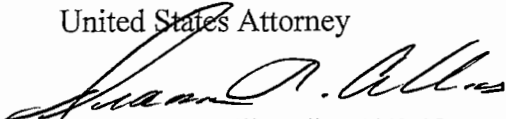
JASMINE OUTLAW

the defendant herein, for the purpose of executing the aforementioned scheme to defraud, knowingly placed in an authorized depository for mail, to be sent and delivered by the United States Postal Service, the following matter: a notice of past due rent to C.Y., in violation of 18 United States Code Section 1341.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney


Dianna R. Collins, #59641MO
Assistant United States Attorney